

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Pharmaceutical Research and
Manufacturers of America,

Case No. 0:20-cv-01497-DSD-DTS

Plaintiff,

v.

**DEFENDANTS' MOTION TO
DISMISS AMENDED COMPLAINT**

Ronda Chakolis, James Bialke,
Amy Paradis, Rabih Nahas,
Michael Haag, Ben Maisenbach,
John M. Zwier, Barbara Droher Kline,
and Kendra Metz, in their official
capacities as members of the
Minnesota Board of Pharmacy,

Defendants.

Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), Defendants respectfully move the Court for an order dismissing all claims in Plaintiff Pharmaceutical Research and Manufacturers of America's amended complaint for lack of subject-matter jurisdiction and for failing to state a claim upon which relief can be granted.

This motion is based on a memorandum of law, affidavits, and exhibits to be filed in accordance with the Court's procedures as stated in docket numbers 106 and 144, and on all the files, records, and proceedings herein.

Dated: September 11, 2024

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

s/Sarah L. Krans

SARAH L. KRANS, No. 0338989
ANGELA BEHRENS, No. 0351076
KATHERINE HINDERLIE, No. 0397325
RICHARD DORNFELD, No. 0401204
GREG MERZ, No. 0185942
Assistant Attorneys General

445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757-1273 (Voice)
(651) 297-1235 (Fax)

sarah.krans@ag.state.mn.us
angela.behrens@ag.state.mn.us
katherine.hinderlie@ag.state.mn.us
richard.dornfeld@ag.state.mn.us
greg.merz@ag.state.mn.us

ATTORNEYS FOR DEFENDANTS

|#5876217